

TO: FCC

FROM: Todd Butterworth, Administrator
Relay Nevada

DATE: September 9, 2003

RE: Docket 03-123

Thank you for the opportunity to comment on important issues related to Telecommunications Relay Services (TRS). Here briefly are our comments:

1. We appreciate the ongoing waivers for IP Relay and VRS. Should the Commission ever find it necessary to shift any costs for these services to the states, it would be greatly appreciated if at least 12 months notice could be given. Because many states may need to go through a long regulatory process to increase their relay surcharge, a longer lead-time will ensure that states have the funding available to cover the costs of IP Relay and VRS.
2. There is pretty universal agreement that a national public education and awareness campaign is needed for TRS, especially a campaign that targets the hearing population. The issue is, how to pay for it? Outreach has long been a normal part of business for states and relay providers. But, while interstate callers have benefited from those outreach efforts, the Interstate TRS Fund has not shared in the costs.

When the State of Nevada does an outreach campaign, the information invariably reaches some individuals who will make intrastate calls and some who will make interstate calls. But, the campaign is funded entirely with intrastate dollars. We estimate that there is between two and five million dollars spent every year by the states on relay outreach.

While it is difficult to quantify the benefit afforded interstate callers by this work, there clearly is a benefit realized. To avoid any complicated cost-sharing arrangement, or an even more complicated reimbursement to the states, it makes sense that the Interstate TRS Fund would match the state-funded outreach effort with some national outreach of its own.

We encourage the Commission to look at outreach as a normal cost of doing business in TRS, and to fund a national public education campaign using the Interstate TRS Fund.

3. It is becoming very clear that the recent breakthroughs in speech recognition technology are going to have a material impact on TRS. Where hard of hearing users currently have VCO calling available, the process is cumbersome and has

been almost entirely rejected by the elderly population (those who need it most). VCO also does not allow for the effective use of a caller's residual hearing. While hearing difficulties fall along a broad continuum of impairment, VCO treats all hearing deficits alike. The voice recognition technology trials going on nationally show that the best way to get hard of hearing individuals using TRS is to offer a system that is more real-time and which enables the effective use of residual hearing.

The potential explosion in the use of TRS—which would result from making relay more functionally equivalent for the hard of hearing—has many states hesitant to voluntarily offer the service. We encourage you to mandate this service, which is a clear improvement to functional equivalence.

4. Finally, the states need the Commission to step up its efforts to enforce the rules it promulgates. While we have been given the responsibility of providing an important service (TRS), we do not always have the necessary authority to enforce related regulations with Local Exchange Carriers—such as Carrier of Choice and mandated outreach. The rules are not worth the paper they are printed on, unless they are enforced.